

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)
vs.)
Plaintiff,)
ANDREW M. JONES,)
Defendant.)
Case No. 11-00101-01-CR-W-ODS

MOTION TO CONTINUANCE SENTENCING HEARING

COMES NOW the defendant, Andrew M. Jones, by and through his counsel, Laine Cardarella, Assistant Federal Public Defender for the Western District of Missouri, and moves this Court to continue the sentencing hearing in this case.

SUGGESTIONS IN SUPPORT

1. On April 20, 2011, the defendant was charged in an indictment with two counts of Attempted and Receipt of Child Pornography over the Internet, 18 U.S.C. § 2252(a)(2) and one count of Possession of Child Pornography, 18 U.S.C. § 2252(a)(4).
2. On April 21, 2011, the Office of the Federal Public Defender was appointed to represent Mr. Jones.
3. On February 27, 2012, defendant entered a guilty plea before the Honorable Ortrie D. Smith, United States District Judge.
4. The preliminary PSI was submitted to the parties on May 21, 2012. Counsel met with Mr. Jones and reviewed the PSI on June 12, 2012. As a result of that meeting, counsel realized that there is additional research she needs to conduct before the sentencing hearing. Counsel requests a date in early August.

5. Kathy Fincham, Assistant United States Attorney, has no objection to the continuance request.

WHEREFORE, the defendant, Andrew M. Jones, respectfully requests this Court and to continue the sentencing in this case until early August.

Respectfully submitted,

/s/Laine Cardarella
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that one copy of the foregoing motion was electronically filed and sent to Kathy Fincham, Assistant United States Attorney, this 13th day of June, 2012.

/s/Laine Cardarella
Laine Cardarella